

1 ROBERT S. MUELLER, III (CSBN 59775)
2 United States Attorney
3 Attorney for Plaintiff

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 WILLIAM ARNOLD MUNIZ,
16 Defendant.
17

No.

VIOLATIONS: Title 18 U.S.C. §§ 1343 and
2 - Wire Fraud; Aiding and Abetting.

18
19 INDICTMENT

20 The Grand Jury charges:

21 COUNTS ONE THROUGH ELEVEN:

(18 U.S.C. §§ 1343 and 2 - Wire Fraud; Aiding and Abetting.)

22 1. Beginning in November 2000, and continuing to in or about February 2001, in the
23 Northern District of California, and elsewhere, the defendant

24 WILLIAM ARNOLD MUNIZ

25 devised a scheme and artifice to defraud and to obtain money and property by means of false and
26 fraudulent pretenses, representations and promises.

27 2. It was part of the scheme to defraud that defendant MUNIZ read out of state newspapers
28

INDICTMENT

1 in order to find advertisements for lost pets or lost jewelry having sentimental value.

2 3. It was further part of the scheme that defendant MUNIZ contacted the people who placed
3 the advertisements for lost pets or jewelry and falsely represented that he had recovered their pets
4 or jewelry, when in fact, he had not.

5 4. It was further part of the scheme to defraud that defendant MUNIZ fabricated stories to
6 tell pet owners regarding the circumstances under which he had allegedly found their pets.
7 For example, MUNIZ told some pet owners that he and his wife were from Canada, had been
8 touring the United States, and had been traveling in the vicinity of the pet owners' homes at or
9 about the time the pets were lost. MUNIZ also claimed that he and his wife had rescued the pets
10 after they had been hit by a car, beaten by a stranger, or suffered some other type of physical
11 trauma. MUNIZ falsely claimed that he and his wife had cared for the pets since rescuing them,
12 and that his wife had become emotionally attached to the pets. MUNIZ also told pet owners that
13 he was willing to return the pets if their owners would reimburse him for transportation costs and
14 other expenses such as veterinary bills.

15 5. It was further part of the scheme that MUNIZ fabricated stories to tell owners of lost
16 jewelry regarding the circumstances under which he had allegedly acquired their jewelry. For
17 example, MUNIZ told some victims that he had been visiting their area at or about the time that
18 the jewelry was lost and had purchased the jewelry from an unidentified person. MUNIZ further
19 claimed that he would be willing to return the jewelry if the owners would pay him the amount
20 he had spent to acquire the jewelry.

21 6. It was further part of the scheme that MUNIZ caused the owners of lost pets and jewelry
22 to wire transfer money to him through Western Union.

23 7. For the purpose of executing the aforementioned scheme and artifice to defraud, the
24 defendant WILLIAM ARNOLD MUNIZ knowingly caused pet and jewelry owners to transmit
25 by means of wire communication in interstate and foreign commerce, namely, wire transfers of
26 funds as follows:

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INDICTMENT

	<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE</u>	<u>DESCRIPTION OF PET/JEWELRY</u>
1				
2	One	11/13/00	\$172 from Denver, Colorado to	Black and White Cat
3			Western Union in San	
4			Francisco, California in the	
5			name William Arnold Muniz	
6	Two	11/28/00	\$1517 from Mascotte, Florida to	Dog
7			Western Union in San	
8			Francisco, California in the	
9			name of William Arnold Muniz	
10	Three	11/30/00	\$644 from Tualatin, Oregon to	Black Cat
11			Western Union in San	
12			Francisco, California in the	
13			name of William Arnold Muniz	
14	Four	12/04/00	\$1000 from Tempe, Arizona to	Border Collie/Shelty Mix
15			Western Union in Daly City,	
16			California in the name of	
17			William Arnold Muniz	
18	Five	12/06/00	\$325 from Phoenix, Arizona to	Great Dane Puppy
19			Western Union in Daly City,	
20			California in the name of	
21			William Arnold Muniz	
22				Antique Diamond Ring
23	Six	12/11/00	\$900 from Clackamas, Oregon	
24			to Western Union in San Bruno,	
25			California in the name of	
26			William Arnold Muniz	
27				Yellow Labrador Retriever
28	Seven	12/20/00	\$900 from Portland, Oregon to	
			Western Union in San	
			Francisco, California in the	
			name of William Arnold Muniz	
	Eight	1/04/01	\$260 from Bloomfield, New	Brown Pit Bull
			Mexico to Western Union in	
			San Francisco, California in the	
			name of William Arnold Muniz	

INDICTMENT

1 Nine 1/05/01 \$210 from Jackson, Mississippi Orange Sable Pomeranian
2 to Western Union in San
3 Francisco, California in the
4 name of William Arnold Muniz
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6 Ten 1/05/01 \$1000 from Richmond, Virginia Blue Basset Hound
7 to Western Union in San
8 Francisco, California in the
9 name of William Arnold Muniz
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11 Eleven 2/11/01 \$900 from Makawao, Hawaii to Two Antique Gold Rings
12 Western Union in Richmond,
13 California in the name of J.P.
14 Whittenburg
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All in violation of Title 18, United States Code, Section 1343 and 2.


DATED:

A TRUE BILL.

FOREPERSON

ROBERT S. MUELLER, III
United States Attorney


DAVID W. SHAPIRO
Chief, Criminal Division

(Approved as to form: )
AUSA HOWDEN

INDICTMENT